



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

January 31, 2013

DARRELL CRATE, TREASURER  
ROMNEY FOR PRESIDENT, INC.  
585 COMMERCIAL ST.  
BOSTON, MA 02109

**Response Due Date**

**03/07/2013**

IDENTIFICATION NUMBER: C00431171

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2012 -  
11/26/2012), RECEIVED 12/22/2012

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 item(s):

1. Please provide a Schedule A-P to support the total amount disclosed on Lines 17(b) and 17(c) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A-P, regardless of the amount. (2 U.S.C. §434(b)(3)(B) and 11 CFR § 104.3(a)(4)(ii))
2. Schedule B-P of your report discloses in-kind contributions to your committee. Please be advised that the value of in-kind contributions must be added to the receipts and disbursements total in order to avoid either inflating or deflating the cash on hand amount, and itemized on the appropriate Schedules A-P and B-P. (11 CFR § 104.13(a)) Please amend your report by itemizing the following in-kind contribution on Schedule A-P: Texans for Greg Abbott - \$36.00.
3. Schedule A-P of your report discloses several transfers from the joint fundraising representative committee "Romney for President, Inc., C00518282." However, the memo entries supporting the transfers do not clearly indicate which transfer each of the memo entries is supporting.

Please be advised that when a committee receives a transfer from a joint fundraising representative, the committee must report its share of net proceeds received from the joint fundraising representative as a transfer-in on Schedule A-P. A memo Schedule A-P must be provided to itemize the committee's share

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of the gross contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the election cycle and all political committees, regardless of amount of the contribution. (11 CFR § 102.17(c)(8)(i)(B)) When itemizing gross contributions, the committee must report the date of receipt as the day the joint fundraising representative received the contribution. (11 CFR § 102.17(c)(3)(iii))

Please amend your report to clearly indicate which supporting memo entries correspond to each transfer from the joint fundraising representative. Please also clarify the name of the joint fundraising representative for the public record.

4. Your report discloses Offsets to Operating Expenditures on Line 20(a) of the Detailed Summary Page that do not appear to have original disbursements with similar purposes (see attached). Please be advised that if there are not corresponding expenditures for these entries, the offsets to operating expenditures may constitute excessive or prohibited contributions. Please amend your report or provide an explanation for this apparent discrepancy. (11 CFR § 104.3(a)(4)(v))

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1154.

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Sincerely,

A handwritten signature in black ink that reads "Jill Sugarman". The signature is written in a cursive, flowing style.

Jill Sugarman  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

**Incorrectly Reported Offsets on Line 20(a)**  
**Romney for President, Inc. (C00431171)**

| <b>Name</b>                                 | <b>Date</b> | <b>Amount</b> | <b>Purpose</b>             |
|---|-------------|---------------|----------------------------|
| Ahrens, Michael R                           | 11/14/12    | \$300.00      | Refund: Equipment Purchase |
| Biundo, Michael                             | 11/9/12     | \$300.00      | Refund: Equipment Purchase |
| Black, Jon                                  | 11/18/12    | \$300.00      | Refund: Equipment Purchase |
| Bundo, Michael                              | 11/18/12    | \$300.00      | Refund: Equipment Purchase |
| Butler, Jeremiah                            | 11/13/12    | \$425.00      | Refund: Equipment Purchase |
| Butler, Sydney                              | 11/13/12    | \$300.00      | Refund: Equipment Purchase |
| Calder, Grant                               | 11/9/12     | \$300.00      | Refund: Equipment Purchase |
| Colorado State Republican Central Committee | 10/31/12    | \$4,000.00    | Refund: Rent               |
| Comcast Financial Agency Corporation        | 11/14/12    | \$1,008.08    | Refund: Delivery Services  |
| Daugherty, Charles                          | 11/16/12    | \$300.00      | Refund: Equipment Purchase |
| Day, Vanessa                                | 11/16/12    | \$300.00      | Refund: Equipment Purchase |
| Donlin, Molly                               | 11/9/12     | \$300.00      | Refund: Equipment Purchase |
| Donovan, Joseph                             | 11/13/12    | \$300.00      | Refund: Equipment Purchase |
| Dorman, Caitlin                             | 11/16/12    | \$300.00      | Refund: Equipment Purchase |
| Downey, Kyle                                | 11/13/12    | \$300.00      | Refund: Equipment Purchase |
| Earl, Madelyn                               | 11/15/12    | \$375.00      | Refund: Equipment Purchase |
| Emper, Christopher                          | 11/15/12    | \$300.00      | Refund: Equipment Purchase |
| Evans, Laine                                | 11/16/12    | \$300.00      | Refund: Equipment Purchase |
| Fitzpatrick, Sean                           | 11/12/12    | \$600.00      | Refund: Equipment Purchase |
| Freund, Andrew                              | 11/18/12    | \$300.00      | Refund: Equipment Purchase |
| Gehring, Alexander                          | 11/12/12    | \$300.00      | Refund: Equipment Purchase |
| Gehring, Alexander                          | 11/13/12    | \$200.00      | Refund: Equipment Purchase |
| Gibson, John                                | 11/12/12    | \$450.00      | Refund: Equipment Purchase |
| Golia, Anthony                              | 11/12/12    | \$375.00      | Refund: Equipment Purchase |
| Hall, Matt                                  | 11/9/12     | \$600.00      | Refund: Equipment Purchase |
| Hancock, Mark K                             | 11/14/12    | \$300.00      | Refund: Equipment Purchase |
| Harmon, Colby                               | 11/13/12    | \$300.00      | Refund: Equipment Purchase |
| Hauptman, Kyle                              | 11/12/12    | \$300.00      | Refund: Equipment Purchase |
| Henneberg, Amanda                           | 11/9/12     | \$300.00      | Refund: Equipment Purchase |
| Hensel, Bentley                             | 11/14/12    | \$350.00      | Refund: Equipment Purchase |
| Hryhorchuk, John                            | 11/13/12    | \$300.00      | Refund: Equipment Purchase |
| Jezierski, JT                               | 11/9/12     | \$300.00      | Refund: Equipment Purchase |
| Lair, Trevor                                | 11/9/12     | \$50.00       | Refund: Equipment Purchase |
| Lair, Trevor                                | 11/16/12    | \$300.00      | Refund: Equipment Purchase |
| Lundry, Alex                                | 11/9/12     | \$300.00      | Refund: Equipment Purchase |
| Magnuson, Karl                              | 11/9/12     | \$1,650.25    | Refund: Equipment Purchase |
| Malcynsky, Caitlyn                          | 11/13/12    | \$200.00      | Refund: Equipment Purchase |
| Malcynsky, Caitlyn                          | 11/14/12    | \$50.00       | Refund: Equipment Purchase |

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**Romney for President, Inc. (C00431171)**

| <b>Name</b>   | <b>Date</b> | <b>Amount</b> | <b>Purpose</b>                     |
|---|-------------|---------------|------------------------------------|
| Martz, M. Luke  | 11/14/12    | \$300.00      | Refund: Equipment Purchase         |
| McMahon, John   | 11/9/12     | \$300.00      | Refund: Equipment Purchase         |
| Morello, Robert Neal  | 11/14/12    | \$300.00      | Refund: Equipment Purchase         |
| Myers, Curt   | 11/8/12     | \$300.00      | Refund: Equipment Purchase         |
| Navarro, Andrew   | 11/16/12    | \$300.00      | Refund: Equipment Purchase         |
| Neunaber, Jill E  | 11/14/12    | \$300.00      | Refund: Equipment Purchase         |
| Ng, Darrel  | 11/14/12    | \$650.00      | Refund: Equipment Purchase         |
| Ng, Jessica   | 11/16/12    | \$75.00       | Refund: Equipment Purchase         |
| Ng, Jessica   | 11/18/12    | \$300.00      | Refund: Equipment Purchase         |
| Nuttall, Adrienne   | 11/14/12    | \$375.00      | Refund: Equipment Purchase         |
| Ohio Republican Party                                       | 11/14/12    | \$21,230.00   | Refund: Broadband Services         |
| Oneal, Emmet IV   | 11/14/12    | \$300.00      | Refund: Equipment Purchase         |
| Patten, Kelsey A  | 11/14/12    | \$300.00      | Refund: Equipment Purchase         |
| Perry, Jordan K   | 11/14/12    | \$400.00      | Refund: Equipment Purchase         |
| Rafdal, Lisa  | 11/16/12    | \$300.00      | Refund: Equipment Purchase         |
| Republican National Convention<br>Committee on Arrangements | 11/16/12    | \$79,275.21   | Refund: Convention Facility Rental |
| Roden, John   | 11/8/12     | \$600.00      | Refund: Equipment Purchase         |
| Russell, Jonathan   | 11/16/12    | \$300.00      | Refund: Equipment Purchase         |
| Saul, Andrea M  | 11/14/12    | \$1,449.25    | Refund: Equipment Purchase         |
| Schoenfeld, Gabriel   | 11/13/12    | \$350.00      | Refund: Equipment Purchase         |
| Sellek, John  | 11/19/12    | \$300.00      | Refund: Equipment Purchase         |
| Simpson, Elizabeth  | 11/20/12    | \$300.00      | Refund: Equipment Purchase         |
| Sparks, Benjamin  | 11/15/12    | \$300.00      | Refund: Equipment Purchase         |
| Spruiell, Stephen   | 11/13/12    | \$1,200.00    | Refund: Equipment Purchase         |
| Steinhoff, Webber   | 11/16/12    | \$300.00      | Refund: Equipment Purchase         |
| Suares, Erica Ann   | 11/14/12    | \$300.00      | Refund: Equipment Purchase         |
| Talley, Brett   | 11/13/12    | \$300.00      | Refund: Equipment Purchase         |
| Tanner, Scott   | 11/8/12     | \$300.00      | Refund: Equipment Purchase         |
| Thompson, Christopher                                       | 11/9/12     | \$300.00      | Refund: Equipment Purchase         |
| Thompson, Ryan  | 11/18/12    | \$500.00      | Refund: Equipment Purchase         |
| Tymkovich, Michael L  | 11/14/12    | \$300.00      | Refund: Equipment Purchase         |
| Vaccaro, Theresa L  | 11/14/12    | \$300.00      | Refund: Equipment Purchase         |
| Walker, Dustin  | 11/8/12     | \$300.00      | Refund: Equipment Purchase         |
| Walters, Richard  | 11/9/12     | \$300.00      | Refund: Equipment Purchase         |
| Walters, Richard  | 11/13/12    | \$300.00      | Refund: Equipment Purchase         |
| Wegmann, Lauren S   | 11/14/12    | \$300.00      | Refund: Equipment Purchase         |
| Williams, Ben   | 11/15/12    | \$300.00      | Refund: Equipment Purchase         |
| Young, Jason  | 11/16/12    | \$350.00      | Refund: Equipment Purchase         |